

REMARKS

Claims 1-17 are all the claims pending in the present application. Applicants thank the Examiner for indicating that claims 13-15 are allowed, and that claims 2-5 and 8-11 contain allowable subject matter and would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 1, 6, 7, 12, 16 and 17 are rejected under 35 U.S.C. § 102(e) as allegedly being anticipated by Ryu et al. (U.S. Patent No. 6,847,633).

A brief description of Ryu is as follows.

Ryu is directed to a method, apparatus, article of manufacture, and a memory structure for communicating information, particularly information transferred to and from an Internet host. The apparatus includes a radio port control unit, comprising a router, and a stub. The router is communicatively coupled to transmit and receive messages with an Internet host and communicatively coupled to a packet forwarding module to accept subscriber unit (SU)-sourced messages and to provide SU-addressed messages to the packet forwarding module in a first data transfer protocol. The stub is coupled between the router and the packet forwarding module to translate messages from the first data transfer protocol to a second data transfer protocol and to translate messages from the second data transfer protocol to the first data transfer protocol. *See Abstract.*

With respect to independent claim 1, first, Applicants submit that Ryu does not disclose or suggest at least, “An apparatus for managing at least one home agent of a home network in a network,” as recited in claim 1. The Examiner cites element 418 and its corresponding description as allegedly satisfying the above-quoted feature of claim 1. However, element 418 of

Fig. 4 only represents a subnet, but does not represent an apparatus (e.g., a device) for managing at least one home agent in a home network.

Second, Applicants are unsure of what the Examiner believes corresponds to the claimed home agent and the Examiner does not even identify what components of Ryu allegedly correspond to the claimed home agent.

Yet further, Applicants submit that nowhere does Ryu disclose or suggest at least, “a database, which stores information indicating whether the home agent operates normally according to the result of the analysis,” as recited in claim 1. The Examiner cites Fig. 4 (element 404), col. 6, lines 36-54, and Fig. 6A (and the description thereof) as allegedly satisfying the feature of claim 1 quoted in the sentence above. However, the description at col. 6, lines 36-54 only discusses how a PC connected to a subscriber unit is forwarded IP datagrams within a particular home IP subnet 418. Fig. 6A and the description thereof only discusses how a SU-addressed data packet is translated from one protocol to another protocol. There is no teaching or suggestion of a database that stores information indicating whether at least one home agent operates normally. Yet further, as indicated above, there is no clear indication of what the Examiner believes corresponds to the claimed home agent, therefore Applicants submit that there clearly cannot be any information indicating whether a home agent operates normally.

Finally, Applicants submit that Ryu does not disclose or suggest at least, “a home agent function executor, which performs a home agent function in place of the home agent when the home agent does not operate normally,” as recited in claim 1. The home agent function executor constitutes an apparatus, and, as indicated above, the Examiner only indicates that the subnet 418 corresponds to the claimed apparatus. Since there is no apparatus for managing at least a home agent of a home network in a network, discussed in Ryu, Applicants submit that clearly there is no home agent function executor that constitutes an apparatus, and performs a home agent

function in place of said at least one home agent when said at least home agent does not operate normally.

At least based on the foregoing, Applicants submit that Ryu does not anticipate claim 1.

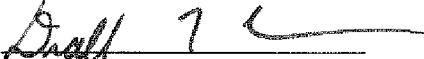
Applicants submit that dependent claim 6 is patentable at least by virtue of its dependency from independent claim 1. Further, with respect to dependent claim 6, Applicants submit that the Examiner does not even address the specific features of this claim.

With respect to independent claims 7, 12, and 16, Applicants submit that Ryu does not anticipate these claims at least based on reasons similar to some of the arguments set forth above with respect to claim 1. Applicants submit that dependent claim 17 is patentable at least by virtue of its dependency from independent claim 12.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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